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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Estados Unidos Mexicanos,

Plaintiff

vs.

Diamondback Shooting Sports, Inc.,
et al.,

Defendants

NO. 4:22-cv-00472-TUC-RM

PROPOSED AMENDED SCHEDULING ORDER

Plaintiff Estados Unidos Mexicanos and Defendants Diamondback Shooting Sports, Inc.; SNG Tactical, LLC; Loan Prairie, LLC d/b/a The Hub; Ammo A-Z, LLC; and Sprague's Sports, Inc. ("Defendants"), by and through counsel undersigned, hereby propose, subject to the Court's approval, the following amended scheduling order.

On January 30, 2025, the Court granted Plaintiff's Motion to Compel. (ECF 111). The Order stated, among other things that Defendants could not withhold documents pursuant to the Tiahrt Amendment, or the Arizona Health and Safety Privilege Act. *Id.* On February 7, 2025, the Parties filed a Joint Motion for Extension of Time to File an Amended

Scheduling Order. (ECF 112). On February 10, 2025, the Court granted the Parties' Joint Motion and ordered the Parties to submit an Amended Scheduling Order by March 14, 2025. (ECF 114).

The parties anticipate filing additional discovery motions related to written discovery and believe that resolution of those motions is essential to determine the end of fact discovery. The Parties have been, and will meet and confer further, but the parties anticipate filing these discovery motions soon thereafter. By agreeing to these dates for the initial motions to compel, the parties do not waive any objections or arguments under the federal or local rules.

The Parties, collectively, propose the following schedule:

EVENT	PROPOSAL
Parties to File Initial Motions to Compel Discovery	April 15, 2025
Deadline to Complete Fact Discovery	Twelve (12) months after the Court rules on the Initial Motions to Compel
Deadline for Plaintiff to serve affirmative expert reports	60 days after the close of fact discovery
Deadline for Defendants' expert reports	60 days after deadline for service of Plaintiff's expert disclosures.
Reply/rebuttal expert reports pursuant to Rule 26(a)(2)(D)(ii)	30 days after deadline for serving Defendants' initial expert report(s).
Deadline to complete expert discovery	90 days after Defendants' deadline for serving Defendants' initial expert report(s)
Deadline to file dispositive motions	90 days after deadline to complete expert discovery.
Jointly proposed pretrial order	Within thirty (30) days after resolution of any summary judgment motions filed.

Filing settlement status reports	All parties and their counsel shall engage in good faith settlement talks no later than 30 days following the completion of fact discovery. A Settlement Status Report shall be filed within 60 days of the completion of fact discovery.
Final Pretrial Conference	To be determined
Trial Begins	To be determined

By agreement of the parties, the Government respectfully submits this Proposed Amended Scheduling Order on behalf of all parties in the case.

Dated: March 14, 2025

Respectfully submitted,

Plaintiff, Estados Unidos Mexicanos By its attorneys, <u>/s/ Ryan O'Neal (AZ # 031919)</u> roneal@dmyl.com DECONCINI MCDONALD YETWIN & LACY, P.C. 2525 East Broadway Blvd., Suite 200 Tucson, AZ 85716-5300 (520) 322-5000 and Steve Shadowen steve@hillardshadowenlaw.com Tina J. Miranda tmiranda@hillardshadowenlaw.com SHADOWEN PLLC 1135 W. 6th Street, Suite 125 Austin, TX 78703 (855) 344-3298	Defendants, Diamondback Shooting Sports, Inc., Loan Prairie, LLC d/b/a The Hub, SNG Tactical, LLC, Sprague's Sports, Inc., and Ammo AZ, LLC By their attorneys, Louis W. Horowitz LORBER, GREENFIELD & POLITO, LLP 3930 E. Ray Road, Suite 260 Phoenix, AZ 85044 lhorowitz@lorberlaw.com and <u>/s/ Jeffrey Malsch (w/ permission)</u> Christopher Renzulli crenzulli@renzullilaw.com Peter Malfa pmalfa@renzullilaw.com Jeffrey Malsch
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and

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Respectfully submitted this 14th day of March 2025.

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By: /s/Ryan O'Neal

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CERTIFICATE OF SERVICE

I, Ryan O'Neal, hereby certify that this document was filed with the Clerk of the Court via CM/ECF. Those attorneys who are registered with the Court's electronic filing systems may access this filing through the Court's CM/ECF system, and notice of this filing will be sent to these parties by operation of the Court's electronic filings system.

Dated: March 14, 2025

/s/Ryan O'Neal
Ryan O'Neal